

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA

23-8140-BER

NO. _____

FILED BY TM D.C.

IN RE SEALED COMPLAINT,

Mar 11, 2023

ANGELA E. NOBLE
CLERK U.S. DIST. CT.
S. D. OF FLA. - West Palm Beach

MOTION TO SEAL

NOW COMES the United States of America, by and through its undersigned attorney, and respectfully requests that, with the exception of those copies to be provided to the United States Attorney's Office, the United States Department of Justice, and their agents for use in the arrest and/or extradition process, the attached complaint, affidavit, arrest warrant, and any resulting orders be SEALED until the arrest of the defendant or until further order of this Court, given that public disclosure of these materials might result in the flight of the defendant and/or his accomplices, compromise the integrity of the ongoing investigation, or compromise the safety of certain witnesses. The United States is prepared to provide further information *in camera* should the Court so require.

Dated: March 11, 2023

Respectfully submitted,

MARKENZY LAPOINTE
UNITED STATES ATTORNEY

GLENN S. LEON, CHIEF
U.S. DEPARTMENT OF JUSTICE
CRIMINAL DIVISION, FRAUD SECTION

By: /s/ Andrea Savdie
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